

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

DAVID ZINK, et al.,)
)
)
Plaintiffs,)
)
)
v.) No. 2:12-cv-04209-NKL
)
)
GEORGE A. LOMBARDI, et al.,)
)
)
Defendants.)

MOTION TO INTERVENE

Comes now movant, Larry C. Flynt, pursuant to Federal Rule of Civil Procedure 24(b) and seeks to intervene in this case for the limited purpose of filing a motion to unseal docket entries based on the First Amendment and common law rights of access. Flynt's proposed motion to unseal and suggestions in support are attached hereto. For the reasons set forth in the suggestions in support of this motion, which are filed herewith, Flynt should be permitted to intervene and file his motion.

Respectfully submitted,

/s/ Anthony E. Rothert
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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and a copy was made available electronically to all counsel of record.

/s/ Anthony E. Rothert